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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARY BENSON, an individual,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
 DEPARTMENT, in its official capacity; and,
 BRET EMPEY, in his official capacity as
 Sergeant of the Las Vegas Metropolitan
 Police Department;

Defendants.

Case. No.: 2:19-cv-01949-RFB-VCF

STIPULATION AND ORDER TO
EXTEND DISCOVERY
DEADLINES
(FIRST REQUEST)

[ECF No. 13]

Pursuant to Fed. R. Civ. P. 16(b)(4) and Local Rule 26-4, Plaintiff MARY BENSON and Defendants LAS VEGAS METROPOLITAN POLICE DEPARTMENT and BRET EMPEY (“LVMPD Defendants”), by their respective counsel, hereby submit this *Stipulation and Order to Extend Discovery Deadlines (First Request)* to request the Court to continue the pretrial and trial dates by approximately six (6) months.

I. DISCOVERY CUT-OFF DEADLINES

A. The discovery cut-off date shall be rescheduled from June 2, 2020 to **November 30, 2020;**

B. The deadline for interim status report shall be rescheduled from April 3, 2020 to **September 30, 2020;**

C. The deadline for the initial disclosure of experts and expert reports shall be rescheduled from April 3, 2020 to **September 30, 2020;**

D. The deadline for the disclosure of rebuttal experts and their reports shall be rescheduled from May 4, 2020 to **October 30, 2020**;

E. The deadline to file dispositive motions shall be rescheduled from July 2, 2020 to **December 29, 2020**; and

F. The deadline to file the Joint Pretrial Order shall be rescheduled from August 3, 2020 to **January 28, 2021**.

II. REASON FOR THE REQUESTED EXTENSION

Pursuant to Local Rule 26-4, the Parties submit that good cause exists for the extension requested.

WHEREAS, the Parties have been diligently conducting discovery. Since January 2020, the Parties have propounded and responded to requests for written discovery; have produced documents relating to liability issues; and have been working to coordinate depositions.

WHEREAS, additional time is needed for discovery due to the current State of Emergency resulting from the COVID-19 virus, including office closures and limitations on travel and personal contact, the Parties are limited in their ability to conduct depositions in the next thirty (30) days.

III. STATUS OF DISCOVERY EFFORTS TO DATE

The following discovery has been completed to date:

1. LVMPD Defendants provided their Fed. R. Civ. P. 26.1 Production of Documents and Witness List on January 6, 2020;

2. Plaintiff Mary Benson provided her Fed. R. Civ. P. 26.1 Production of Documents and Witness List on January 7, 2020;

3. LVMPD Defendants propounded their First Set of Requests for Production of Documents to Plaintiff Mary Benson on January 17, 2020;

4. Plaintiff Mary Benson responded to LVMPD Defendants' First Set of Requests for Production of Documents on March 10, 2020;

5. Plaintiff provided her First Supplement to her Fed. R. Civ. P. 26.1

Production of Documents and Witness List on March 10, 2020;

6. Plaintiff Mary Benson propounded her First Set of Requests for Production of Documents to Defendant Sgt. Bret Empey on March 13, 2020; and

7. Plaintiff Mary Benson propounded her First Set of Requests for Production of Documents to Defendant Las Vegas Metropolitan Police Department on March 13, 2020.

IV. DISCOVERY REMAINING

The Parties agree that the following discovery must be completed:

1. LVMPD Defendants responses to First Set of Requests for Production of Documents;

2. The deposition of Plaintiff;

3. The depositions of Defendants;

4. The depositions of witnesses;

5. The deposition(s) of the Defendants' Person(s) Most Knowledgeable;

6. The deposition(s) of expert witness(es) designated by all Parties;

7. Additional written discovery; and

8. Additional records collection.

V. CONCLUSION

Based on the above, requisite good cause exists to warrant an extension of the Scheduling Order (ECF No. 13) deadlines. Accordingly, the Parties respectfully request that this Court extend the current deadlines by approximately six (6) months in order to allow all Parties to adequately complete discovery and to resolve present scheduling conflicts.

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IT IS SO STIPULATED.

DATED this the 25th day of March, 2020.

MARQUIS AURBACH COFFING

/s/ Nick D. Crosby
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DATED this the 25th day of March, 2020.

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ORDER

IT IS SO ORDERED.

DATED this 26th day of March, 2020.

 U.S. MAGISTRATE JUDGE